

Please
Docket

SCHEPER KIM & HARRIS LLP

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March 16, 2020

VIA U.S. MAIL AND E-MAIL TO
LENORA KASHNER WITTJE@PAED.USCOURTS.GOV

The Honorable Paul S. Diamond
14614 U.S. Courthouse
601 Market St.
Philadelphia, PA 19106

Re: Criminal case No. 18-322

Your Honor:

I represent defendant George Matin and write to request that that Mr. Matin's sentencing be postponed from April 16, 2020 to June 18 or 19, 2020 due to COVID-19 concerns. The government does not oppose this request.

Because Mr. Matin (age 60) resides in Los Angeles, California, he must travel by plane to Philadelphia for the sentencing. The CDC is currently recommending that older adults (age 60 and older) avoid nonessential domestic air travel due to the risk of exposure in crowded travel settings like airports and planes.¹ The CDC is also recommending limiting travel if COVID-19 is spreading where one lives. As of March 15, 2020, Los Angeles County has reported 69 cases of the virus, a number that rises daily.² In addition to concerns for Mr. Matin's own health, counsel is concerned that should Mr. Matin travel to Philadelphia and return to Los Angeles, he could expose his two elderly parents (with whom he resides) to the virus. Experts currently believe that the infection rate will continue to increase for at least the next few months.³

Mr. Matin has been on home detention and electronic location monitoring since his change of plea hearing on October 10, 2019. Accordingly, he is not a flight risk.

¹ <https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-in-the-us.html>

² <https://www.foxla.com/news/la-public-health-reports-16-new-covid-19-cases-in-the-county>

³ <https://time.com/5801726/coronavirus-models-forecast/>

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The Honorable Paul S. Diamond

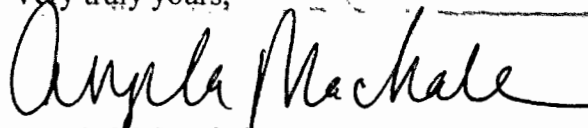
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I contacted the Assistant United States Attorney handling this matter, Patrick Murray (copied here), on March 16th, and Mr. Murray advised that the government does not oppose this request for a continuance.

If Your Honor has questions or needs further information regarding this request, I am happy to participate in a conference call with Your Honor and the government.

Very truly yours,

A handwritten signature in black ink, appearing to read "Angela Machala". The signature is fluid and cursive, with a long horizontal stroke at the end.

Angela M. Machala

SCHEPER KIM & HARRIS LLP

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cc: Patrick Murray, Assistant United States Attorney (via e-mail)